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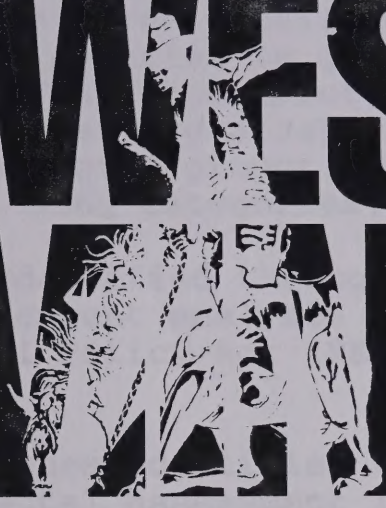
SOUTHWEST WYOMING



Resource Evaluation

Issue Identification

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SOUTHWEST WYOMING RESOURCE EVALUATION

ISSUE IDENTIFICATION

The issues to be considered during the Southwest Wyoming Resource Evaluation (SWRE) were identified by members of the public; government agencies (e.g., U.S. Forest Service, Wyoming Game and Fish Department); environmental, conservation, and user organizations; industry; the BLM; and other interested groups. The issues are grouped into the following categories:

1. **RESOURCE ISSUES**: Issues identified through the scoping and environmental document analysis stages of the National Environmental Policy Act (NEPA) process.

2. **PUBLIC COMMENT ISSUES**: Issues identified through public comments on environmental assessment (EA) and environmental impact statement (EIS) documents.

3. **OTHER ISSUES**: Issues identified by public input other than through the NEPA process, e.g., the Green River Basin Advisory Committee (GRBAC)

The resource and public comment issues were derived from the following documents:

- Enron Oil and Gas Company East LaBarge Infill
- Enron Burley Area Draft and Final EIS
- Creston/Blue Gap Draft (May 1994) and Final EIS
- Texaco Stagecoach Draw Unit Draft and Final EIS
- Greater Wamsutter Area II Draft and Final EIS
- Fontenelle Natural Gas Infill Drilling Projects Draft and Final EIS
- Expanded Moxa Arch Area Natural Gas Development Project Draft and Final EIS
- HS Resources Inc Natural Gas Exploration Project EA

RESOURCE ISSUES

1. **ENRON OIL AND GAS COMPANY EAST LABARGE INFILL DRILLING PROJECT EA (May 1992)**

- Impacts to big game critical winter habitats

- Impacts to nesting raptors
- Sensitive and threatened and endangered (T&E) plant and animal species
- Impacts to sage grouse breeding and nesting habitat
- Visual impacts to the general public traveling on U.S. Highway 189 and to recreational users of the Green River
- Increased traffic and associated impacts on county roads and state highways
- Noise impacts
- Highly erosive and unstable soils
- Sedimentation impacts on the Green River and other waterways
- Wetland/riparian and floodplain area protection pursuant to Executive Orders 11990 and 11988 and loss of riparian habitat
- Reclamation and noxious weeds
- Conflicts with livestock and range improvements; impacts on grazing permits
- Compatibility with management plans and objectives
- Cultural resources
- Surface and groundwater resources
- Increased human activity
- Social and economic effects to local communities
- Cumulative impacts
- Disturbance to selenium soils
- Transportation of hazardous materials
- Pits

2. ENRON BURLEY AREA DEIS (FEBRUARY 1994)

- Impacts of development and the water injection program on soils, ground water and wildlife

3. CRESTON/BLUE GAP PROJECT DEIS (MAY 1994)

- Reasonable access to public lands
- Expeditious completion of the EIS
- Use of best management practices during construction and production operations
- Need for a Storm-water Pollution Prevention Permit
- Unreasonable restrictions on construction of utility and pipeline facilities
- Road surfacing
- Potential minable coal beds

- Highly erodible and unstable soils
- Paleontological resources
- Surface water and groundwater quality and quantity protection
- Reclamation and reseeding with native species
- Mobilization of selenium
- Noxious weed control
- Wetland and aquatic habitats
- Wildlife and fisheries
- Direct and indirect wildlife habitat loss
- Big game winter range and migrations
- Sage and sharp-tailed grouse
- Raptor protection
- Poaching impacts and mitigations
- Sensitive, priority, and T&E species including down stream fish species
- Wild horses
- Cultural/historical resources including historic trails and adherence to National Historic Preservation Act and Advisory Council regulations
- Conformance with current and future land uses
- Increased human activity
- Impacts to recreation (e.g., hunting)
- Social and economic effects to local communities
- Revenue generation
- Increased jobs
- Visual resource sensitivity
- Cumulative impacts

4. TEXACO STAGECOACH DRAW UNIT DEIS (MARCH 1995)

- Development of an oil and gas unit where few or no man-made facilities presently exist
- Water quality and aquatic resources, especially in Bone Draw and the Big Sandy River
- Impacts to the Big Sandy and Green River riparian corridors
- Flood protection
- Impacts to wetlands
- Groundwater
- Stormwater discharge
- Threatened, endangered, and candidate animal and plant species
- Antelope crucial winter habitat--including cumulative impacts--and mitigation routes

- Sage grouse, raptors, and their habitats
- Electrocution of raptors from powerlines
- Availability of water for livestock and wildlife
- Reclamation potential of soils
- Paleontological resources
- Access to state highways
- Traffic volume on county roads and Gasson Bridge
- Visual impacts to Seedskadee National Wildlife Refuge and National Historic Trails
- Noise

5. GREATER WAMSUTTER AREA II DEIS (JANUARY 1995)

- Erosion resulting from access road, pipeline, and drill site construction activities
- Impacts to wildlife and other sensitive species in the analysis area and adjacent lands including the big game, sage grouse, raptors, and non-game wildlife species
- Impacts to T&E and sensitive plant and animal species and communities
- The number of workers required for the proposed project and the amount of worker accommodations needed to facilitate the work force. Related concerns include whether workers will live in designated camps or commute from surrounding areas and the effect construction activities will have on the economy
- Potential impacts to surface and groundwater resources within the GWAII analysis area and surrounding lands
- Cumulative impacts of field development relative to other land and resource activities in the area, both ongoing and proposed
- Existing road and gas pipeline problems
- Increased traffic and associated impacts on existing county, state and BLM roads
- Utilization of existing road and pipeline corridors rather than construction of new ones (i.e., cumulative site disturbance effects resulting from additional road and pipeline construction within an existing corridor)
- Impacts to unknown prehistoric and historic values as well as paleontological resources
- Disruption of livestock management operations

(primarily herding) and potential for loss of suitable forage within the unit area due to field development activities
- Potential impact of emissions resulting from additional drilling and production activities
- Reclamation of disturbed areas and control of noxious weed invasions
- Drainage of the federal mineral estate by wells drilled on adjacent lands and the development of mitigation measures necessary to avoid this impact
- Concerns that well drilling, completion and operation will cause mixing of different quality groundwater, resulting in groundwater quality degradation
- Concerns that standard operating procedures in regard to well completion are not sufficient to prevent leakage and groundwater quality degradation
- Concerns that corrosion of well casings will result in leakage into groundwater and water quality degradation
- Concerns that leakage could cause degradation of mineral resources through contamination

6. FONTANELLE NATURAL GAS INFILL DRILLING PROJECTS DEIS (April 1995)
- Impacts to petrified wood and vertebrate fossils in the Wasatch, Green River, and Bridger formations
- Cumulative impacts to water quality of the Green River and other surface waters
- Impacts to big game crucial winter range
- Cumulative impacts to wildlife and wildlife range
- Impacts to migratory birds and raptors
- Impacts on wildlife habitats and habitat effectiveness
- Impacts on fisheries in the Green River.
- Soil erosion, sedimentation and other impacts to surface water quality
- Impacts on employment, housing
- Impacts on historic trails and sites
- Impacts on housing and land use
- Impacts from a spill of hydrocarbons or hazardous materials
- Impacts to soils and steep slopes
- Impacts on air quality

- Impacts to Wilderness Study Areas
- Compatibility with existing management plans and objectives
- Cumulative impacts
- Impacts to water withdrawals from the Green River
- Disposal of drilling fluids and hydrostatic test water
- Erosion control and storm-water pollution prevention
- Impacts on Fontanelle Reservoir
- Impacts on Seedskadee National Wildlife Refuge
- Implementation of mitigation and monitoring measures

7. EXPANDED MOXA ARCH AREA NATURAL GAS DEVELOPMENT PROJECT DEIS (April 1995)

- Disruption of livestock management operations (primarily herding) and potential for loss of suitable range forage within the analysis area resulting from additional field development activities
- Cumulative impacts of natural gas in-fill development relative to other land and resource activities in the area, both on-going and proposed
- Air quality of the area resulting from dust and emissions created by construction and natural gas production activities
- Increased traffic and associated impacts on existing county, state, and BLM roads.
- Utilization of existing road and pipeline corridors rather than construction of new ones(i.e., cumulative site disturbance effects resulting from additional road and pipeline construction within an existing corridor)
- Impact to mineral and paleontological resources at all disturbed sites associated with natural gas production operations
- Concern that well casing corrosion and leakage could cause degradation of mineral resources through contamination
- Impacts to the quality of surface and groundwater resources and wetland areas within the analysis area and adjacent lands
- Concerns that well drilling, completion, and

operation will cause mixing of different quality groundwater, resulting in groundwater quality degradation
- Concerns that corrosion of well casings will result in leakage into groundwater and water quality degradation
- Concerns that standard operating procedures in regard to well completion are not sufficient to prevent leakage and groundwater quality degradation
- Increased erosion resulting from access roads, pipeline, and drill site construction activities, primarily on sensitive soils (e.g., those which are highly erosive such as red soils, calcareous soils, sand dunes, or sandy soils)
- Reclamation of disturbed areas and control of noxious weed invasions following reclamation
- Possible adverse impacts to wildlife and habitats in the analysis area/adjacent lands, including sage grouse, raptors, prairie dogs, big game winter range (primarily pronghorn antelope), and non-game wildlife species
- Impact to special status plant and animal species and communities.
- Impacts associated with noise due to construction activities and natural gas production operations
- Potential impacts to known and unknown cultural and historic values within the analysis area
- Socioeconomic impacts to local communities resulting from project implementation, subsequent increased demand on local facilities and services, and additional strain on the existing housing market

8. **HS RESOURCES INC. NATURAL GAS EXPLORATION PROJECT EA (June 1995)**
- Confidence in HS's ability to operate in the area without undue environmental harm
- Support of lease holder's rights
- Timely development of natural resources
- Need for an EIS prior to exploration or industrial activity
- Compliance with Sec. 404 of the Clean Water Act (33U.S.C.1344), Fish and Wildlife Conservation Act and Executive Orders 11990 and 11988

- U.S. Army Corps of Engineers (COE) consultation regarding the need for a 404 permit
- Drilling locations large enough to accommodate proposed operations
- Roads widened and maintained to ensure safety
- No road upgrades--exploration and drilling rigs should use existing travelways
- Increased traffic/area access
- Appropriate road location and use to account for sensitive areas (roads should be located at least one mile from the Sand Dunes WSA and crucial wildlife habitats)
- Project is not located in an environmentally sensitive area
- Presence of landslides in the project area
- Occurrence of mammalian fossils in the project area in the Tipton Shale and main body of the Wasatch Formation
- Soils /sand dune disturbance and reclamation
- Impacts to wetlands and waters of the U.S.
- Specification of avoidance, mitigation, and compensation measures for wetland impacts (where wetlands are impacted, they should be inventoried and their functions and values fully described)
- Protection of waters from contamination
- Water quality impacts to fisheries, migrating birds, and T&E species
- T&E and candidate species impacts
- Impacts from water depletions on T&E fish species in the Colorado River System
- Need for a biological assessment
- Activities affecting water quality that could expose fish and wildlife to hazardous substances
- Noise impacts
- Weed infestations
- Assurance of wildlife resource protection
- Short- and long-term impacts on fish and wildlife and their habitats
- Big game calving, fawning, and crucial winter ranges
- Impacts to sage grouse, raptors, and migratory birds
- Impacts to wild horses
- Cultural/historic resources

- Proximity to WSAs and an Area Of Critical Environmental Concern (ACEC)
- No development activity in the Sand Dunes WSA.
- Protection of aesthetics, solitude, air quality, and recreation criteria of the Sand Dunes and Buffalo Hump WSAs
- Project is located within a proposed National Conservation Area (project impacts on the values of the NCA should be assessed
- Visual resource impacts
- Adequate cumulative impact assessment

PUBLIC COMMENT ISSUES

1. ENRON BURLEY AREA FEIS (JUNE 1994)
- Impact of plug and abandonment and injection on ground water
- Impact of reserve and production pit on birds
- Cumulative Impacts
- Impact of development on candidate plants and animals

2. CRESTON/BLUE GAP PROJECT FEIS (AUGUST 1994)
- Impacts to water quality conditions in Muddy Creek
- Fencing impact to winter migration
- Impacts to sage grouse
- Impacts to fisheries in the Little Snake River and Muddy Creek
- Impact on T&E Species
- Impact of road density on wildlife, visual, vegetation

3. TEXACO'S STAGECOACH DRAW UNIT FEIS (JUNE 1995)
- The discussion of cumulative impacts needs to address the interactive effects of all previous, existing, and future cultural modifications of the land and the addition of oil and gas impacts to these
- Impacts of past development on antelope
- Impact of development upon aquatic resources
- Impact of pipelines on wetland and riparian areas

4. GREATER WAMSUTTER AREA II FEIS (JULY 1995)
- Impact to aquatic resources and water quality

- Positive economic impacts to the cities, counties, and the state
- Incomplete cumulative impact analysis
- Reduction in habitat effectiveness
- Impacts to wildlife
- Antelope seasonal ranges
- Sage grouse

5. FONTANELLE NATURAL GAS INFILL DRILLING PROJECTS FEIS (MAY 1996)

- The cumulative impacts from the Fontanelle projects and numerous other proposed oil and gas activities in southwest Wyoming are not being adequately addressed
- The EIS did not consider a reasonable range of alternatives to the Proposed Action, and the No-Action Alternative was improperly dismissed
- The EA does not adequately address impacts on protected wildlife species or other wildlife resources
- The proposed development does not account for the region-wide impacts causing the area to be converted to a heavily industrialized landscape. A programmatic cumulative effects EIS should be prepared for southwest Wyoming
- Impact on wild horses
- Impact on air quality in the region
- Wildlife
- Antelope
- Deer
- Elk
- Sage grouse
- Raptors
- Air Quality
- Visibility
- Water Quality
- Recreation
- Inaccurate disclosure of impacts
- Inadequate baseline data to assess impacts to wildlife and cumulative impacts
- Economic value of the projects to the cities, counties and state

6. EXPANDED MOXA ARCH AREA NATURAL GAS DEVELOPMENT PROJECT FEIS (JUNE 1996)

- No real protection for wild horses and other native species
- Degradation of the ecosystem
- Loss of wildlife habitat
- Adverse visual impacts
- Recreation values lost
- Solitude and isolation
- No air quality analysis
- Air quality impacts
- Stipulations and requirements imposed upon the applicant are excessive
- Paleontology
- Wildlife restrictions
- Operations in sensitive areas
- Impact of development on wildlife populations and habitat
- Impact on National Historic Trails
- Pipeline and road crossing
- Programmatic EIS is needed
- EIS does not adequately address cumulative impacts
- Impacts to fauna
- Impacts to protected plant species
- Impacts to air and water quality
- Impacts to wetlands and riparian areas
- Failure to provide an accurate and honest analysis of the direct, indirect, and cumulative impacts of energy development in southwest Wyoming
- Scope of analysis
- Other projects and proposals must be identified in the Moxa Arch Area EIS
- Environmental analysis process flawed
- Environmental consequences not analyzed
- Multiple use impacts generally
- Recreation
- Socioeconomic impacts
- Fails to discuss benefits of tourism and big game license receipts
- Geologic hazards (seismic)
- Noise impacts
- Cultural resources (historic trails and Native American religious sites)
- Special management areas

- Water resources (ground water)

OTHER ISSUES

1. GREEN RIVER BASIN ADVISORY COMMITTEE

- Streamline the cultural resource process
- Consideration of interim reclamation
- Undertake review of BLM policies designed to protect non-mineral resources
- Reclamation efforts re: wildlife for consistency
- Decisions on air quality based on scientific fact
- Consolidation of leases, help industry to promote planning
- Reclamation needs of abandoned wells
- Identify an interim level of development which could take place during the review of the Cumulative Impacts Task Force
- Identify ways to restore ability of local BLM managers to make decisions based on their experience
- Geophysical exploration, restrictions on examining leases, better planning on geophysical
- Heavy emphasis on economic impact as it affects state of Wyoming and look at NEPA process and putting certainty on time frames and predictability
- Eliminate majority of uncertainties
- Consider local economies
- Look at system for full public disclosure, recognize cyclic nature and balance with BLM abilities
- Shrinking federal budget consequent inability of BLM and Forest Service to complete NEPA documents in reasonable time. How to offset the added cost to operators for assuming those costs
- How to deal with impacts of other multiple use aspects on public lands within this process without overwhelming GRBAC's efforts and goals
- Multiple use of areas and impact on other permittees so as not to disenfranchise them
- When/how to deal with data gaps in fair and honest manner
- Provide BLM with guidance on analysis for NEPA analysis. Cumulative effects from all projects and size area being looked at

- Effective and meaningful monitoring foundations in order to learn and act accordingly
- Discuss BLM's leasing process re orderly development, amount of federal land available

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